

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Cambridge Electric Light Company and Commonwealth Electric Company, d/b/a NSTAR Electric	) ) ) ) )	D.T.E. 04-114
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ATTORNEY GENERAL'S SECOND SET OF  
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's SECOND SET of DISCOVERY in the above referenced docket.

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| AG-2-1 | Refer to the response to AG-1-18. Please provide copies of all documents supporting the congestion costs incurred by Cambridge Electric Light Company during 2003 and 2004. Include copies of all agreements among and between the Company, ISO-NE, and generating companies that relate to the "congestion" costs appearing in Exhibit CAM-CLV-3 (Supp.).   |
| AG-2-2 | Refer to the response to AG-1-8. Please explain, in detail, why the Company is paying congestion costs associated with Mirant Kendall Station. Explain what a "Special Constraint Resource" is. What entity determines the "Special Constraint Resource" status and how is the determination made.   |
| AG-2-3 | Refer to the response to AG-1-8. Please provide an estimate of the annual "congestion" costs associated with Mirant Kendall Station. Include all supporting documentation, calculations and assumptions. Include an explanation of how the Company incurs the Mirant related "congestion" charges. Provide a copy of the tariff under which the charges are made.  |
| AG-2-4 | Refer to the response to AG-1-8. What regulatory entity authorized the Mirant Kendall Station congestion charges? What actions did the Company take to mitigate these charges? Include all documentation supporting the Company's mitigation efforts. Identify all other entities that are responsible for paying the Mirant Kendall Station congestion charges. What actions did the other entities take to mitigate these costs. |
| AG-2-5 | Please provide a copy of all documents filed in the FERC docket ER05-26. Provide a synopsis of the proceedings to date and the current status of the case.   |

- AG-2-6 According to publically available documents in FERC docket ER05-26 an RMR contract between Mirant and ISO-NE was entered into. FERC accepted the RMR contract for filing, effective October 8, 2004, subject to refund. According to Exhibit CAM-CLV-3 (Supp) and the response to AG-1-18, the Company incurred Mirant Kendall related costs prior to October 8, 2004. Under what contract or regulatory provisions did the Company incur these costs?
- AG-2-7 Please describe the reliability problem that is being solved by Mirant Kendall Station. Identify specific facilities that are deficient and identify these facilities as either transmission or distribution facilities. What must be done to eliminate this problem? What is the plan to eliminate the problem and what is the associated time line?
- AG-2-8 Please provide a chart showing (1) all transmission and scheduling, system control and dispatch costs and expenses for 2004 by FERC account number (detailed to the lowest level of sub account number maintained by the Companies) and (2) the specific transmission tariff, schedule and attachment under which each cost and expense is recoverable. Include a full description of each tariff, schedule and attachment. Please identify the lines on Exhibits CAM-CLV-3(Supp.), p. 1 and COM-CLV-3(Supp.), p.1 include each of these costs. Specify the amount that is included on each line.
- AG-2-9 Please provide a chart showing (1) all transmission and scheduling, system control and dispatch costs and expenses for the years 1998-2003 by FERC account number (detailed to the lowest level of sub account number maintained by the Companies) and (2) the specific transmission tariff, schedule and attachment under which each cost and expense is recoverable. Include a full description of each tariff, schedule and attachment. Please identify the lines or columns that appeared in the Companies' annual retail transmission cost reconciliation schedules (the equivalent to the 2004 Exhibits CAM-CLV-3(Supp.), p. 1 and COM-CLV-3(Supp.), p.1) that include each of these costs. Specify the amount that is included on each line/column.
- AG-2-10 Refer to Exhibits CAM-CLV-3(Supp.), p. 1 and COM-CLV-3(Supp.), p.1. Are any of the costs included in line 11(Retail Schedule & Dispatch Cost) of the exhibits, also included in the amount shown on line 1 (Monthly Transmission Revenue Requirement (OATT)) of the exhibits? If yes, please provide such amounts for the years 1998-2004. If no, was this true in 2003 based on Exhibits CAM and COM-JFL-3 (Supp), p. 2, filed in DTE 03-118? If it was true in 2003, please provide the amount of such costs for the years 1998-2003.
- AG-2-11 Refer to Exhibits CAM-CLV-3(Supp.), p. 1 and COM-CLV-3(Supp.), p.1. Are any of the costs included in line 11(Retail Schedule & Dispatch Cost) of the exhibits, also included in the amount shown on line 8 (Retail OATT Sch. 1 SCADA Revenue Requirement) of the exhibits? If yes, please provide such

amounts for the years 1998-2004. If no, was this true in 2003 based on Exhibits CAM and COM-JFL-3 (Supp), p. 2, filed in DTE 03-118? If it was true in 2003, please provide the amount of such costs for the years 1998-2003.

- AG-2-12      On March 29, 2005 the Companies filed modifications to portions of their transmission tariffs with an effective date of June 1, 2005. In the Exhibit NS-4 the Companies present summaries of the revenue requirement impact of the proposed changes. These impacts are based on 2004 costs. Please provide the same type of impacts based on the proposed tariffs having been implemented in 2003. Please provide all supporting workpapers, calculations and documentation.
- AG-2-13      Regarding the March 29, 2005 transmission tariff filing referred to above. Please provide all supporting workpapers, calculations and documentation related to Exhibit NS-4.

Dated: April 4, 2005